

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:) CASE NO: 11-46218-399 Chapter 13
KEITH WADE BASS)
) Trustee's Objection to Confirmation
AMBER DENISE BASS)
) Original confirmation hearing
Debtor(s)) set for Aug 24, 2011 10:00 AM

TRUSTEE'S OBJECTION TO CONFIRMATION OF 1ST AMENDED PLAN

COMES NOW John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. Proposed plan payment does not constitute debtor's best effort to repay creditors. 11 U.S.C. Secs. 1325(a)(3) & (b)(1)(B)
2. The plan is ambiguous or incapable of ascertainment (11 U.S.C. Secs. 1321 & 1325(a)(3)) because:
SCHEDULE I OVERSTATES UNION DUES PER PAY ADVICES AND TESTIMONY.
3. A.RE #1 B22C OVERSTATES UNION DUES PAID. PLAN MUST GUARANTEE \$53,469.
B.5B INCLUDES AUTO PURCHASED OVER 910 DAYS BEFORE FILING.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

/s/ John V. LaBarge, Jr.

KLW-351

Copy served on the following either
through the Court's ECF system or by
ordinary mail on July 15, 2011

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